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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR 07-00006 SBA
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO SET
v.)	PRETRIAL DEADLINES DATE FOR
)	SUBMISSION OF PRETRIAL
JOANNE FOUNTAINE and)	PREPARATION
ANTHONY TIMMONS,)	
)	
Defendants.)	

STIPULATION

The parties, by and through undersigned counsel, hereby agree and stipulate as follows:

Trial in the present case is set for October 6, 2008. On August 13, 2008 the parties stipulated that the deadline for submission of pretrial preparation required by the Court be set for September 9, 2008. The parties further stipulated that the deadline for motions in limine and objections to evidence be September 16, 2008, and that the deadline for responses to motions in limine and objections to evidence be September 23, 2008.

The parties are presently engaged in discussions regarding a potential resolution of the case by plea agreements. The parties are very close to reaching a resolution of the case, and are

STIPULATION AND [PROPOSED] ORDER
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presently in the process of achieving agreement upon key terms and conditions of potential plea agreements.

For the foregoing reasons, the parties stipulate and request that the deadline for submission of pretrial preparation be set for September 12, 2008, not September 9, 2008. The parties agree that all other dates be set according to the parties' stipulation of August 13 2008, pending any changes of plea by the defendants.

LATHAM & WATKINS LLP

Dated: September 8, 2008

By /s/
ROBERT E. SIMS
HOLLY J. TATE
Attorneys for Defendant
Joanne Fountaine

Dated: September 8, 2008

By /s/
LINDA FULLERTON
Attorney for Defendant
Anthony Timmons

JOSEPH P. RUSSONIELLO
United States Attorney

Dated: September 8, 2008

By /s/
ANDREW S. HUANG
CHINHAYI J. COLEMAN
Assistant United States Attorneys

ORDER

Based on the reasons provided in the stipulation of the parties above, the Court hereby ORDERS that the deadline for submission of pretrial preparation be SET for September 12, 2008. The Court further ORDERS that the deadline for motions in limine and objections to evidence be SET for September 16, 2008, and that the deadline for responses to motions in limine and objections to evidence be SET for September 23, 2008.

Dated: September 9, 2008


Hon. SAUNDRA BROWN ARMSTRONG
United States District Court
Northern District of California